

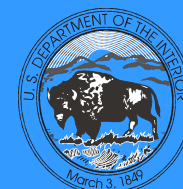
US EPA ARCHIVE DOCUMENT

# National Schedule Coordination Committee



EPA  
OPS

USCG  
MMS



## PREP Guideline Changes Area Exercise Process

Bud Hunt - EPA Oil Program Center  
Bob Pond – USCG Office of Response

# Background

- Oil Pollution Act of 1990  
Equipment testing and drills for ACPs, FRPs, VRPs
- Guidelines adopted in 1994
  - Adopted by EPA, USCG, OPS, and MMS
  - Periodic public meetings to assess
  - Aug 2000 first to recommend amendment/reissue
- Revised PREP Document found at:  
<http://www.uscg.mil/hq/nsfcc/nsfweb> or  
<http://www.uscg.mil/g-m/nmMisperceptionsEP>

# Key Changes & Clarifications

- Equipment Deployment Exercises
  - Greater specificity of equipment types
    - Exercise record certifies plan holder determination that Spill Management Team (SMT) meets its response needs
  - Definition of regional OSROs
    - OSRO exercise in each operating environment of each planning area
    - Unless Area Committee/OSC agree to combined exercises
  - Exercise systems not individual equipment
  - Coordinate Exercises to test strategies

# Key Changes & Clarifications

- Spill Management Team (SMT) Exercise
  - Contract SMT exercises
    - Criteria for multiple plan holder credit in multiple areas
    - Plan holder must observe and have opportunity to discuss plan holder specific issues
    - Exercise record certifies plan holder determination that SMT meets its response needs.

# Key Changes & Clarifications

- Area Exercises
  - Scheduling Gov't/Industry Exercise 3 yrs out
  - Minimum Scope
    - Major Spill or
    - Worst Case Discharge Tier 1
    - Exercise Area response management system with unified command
  - Must include industry funded equipment deployment to test plan strategies.

# Key Changes & Clarifications

- Government Initiated Unannounced Exercises
- Potential change in number of exercises in EPA Regions (up to 10% plan holders)
- Exercise assessment process
  - Confirm size of discharge and location
  - Definition of timely deployment
  - Definition of “Unsatisfactory”
  - Issuing credit dependent on exercise success

# Current Situation

- Draft Guidelines posted and available at
  - <http://www.uscg.mil/hq/nsfcc/nsfweb> or
  - <http://www.uscg.mil/g-m/nmc/response/#PREP>
  - Published in Federal Register March 13, 2002  
FR Volume 67, page 11368
  - Comments accepted for 60 days (May 13, 2002)
- Revised PREP Guidelines publication Aug 2002
  - Unless serious objections received
- PREP Workshop Nov 8, 2002
  - Following Clean Gulf 2002, Galveston Texas



# National Schedule Coordination Committee Contacts

- Bud Hunt – EPA – 703-603-8736,  
[hunt.bud@epa.gov](mailto:hunt.bud@epa.gov)
- Bob Pond – USCG – 202-267-6603,  
[rpond@comdt.uscg.mil](mailto:rpond@comdt.uscg.mil)
- Melanie Barber – OPS – 202-366-4560  
[Melanie.Barber@rspa.dot.gov](mailto:Melanie.Barber@rspa.dot.gov)
- David Moore – MMS – 703-787-1637

# National Strike Force Coordination Center Support for Area Exercises

Lee Foresman

(252) 331-6000, ext 3054

e-mail: [lforesman@nsfcc.uscg.mil](mailto:lforesman@nsfcc.uscg.mil)

# NSFCC Support to Government Led Area Exercises

- 6 Per Year
  - 5 USCG FOSC, 1 EPA FOSC
- Assess Area Contingency Plans
  - Area Committee Participation in Process
- Exercises aligned with PREP Guidelines
  - Process Improvement, Non Punitive

# Area Exercise Misperceptions

- Must be Large, Lengthy, and Expensive
- Response Organizations Must Use ICS
- EPA Exercises Must Include HAZMAT Response

# NSFCC Exercise Development Process

- Response Organizations Set Exercise Objectives and Scenario
- Evaluation Objectives – Set by Participants, Process Focused
- Geared to Meet Needs of Response Community

# NSFCC Exercise Services

- Development Support
  - Dedicated Exercise Team
- Execution Support
  - Core Control and Controller Staff
  - Control Communication and Information System
- Exercise Assessment Support
  - Administrative, Facilitation Support

# NSFCC Exercise Formats

- Facilitated Table Top Exercise (TTX) – Policy Decisions
- Structured Command Post Exercise – ICS Training
- Unstructured Command Post Exercise – Response Management Process
- Equipment Deployment Exercise – Equipment Deployment

# NSFCC Limitations

- Budget
- Process
- Schedule



Lee Foresman

NSFCC

Chief, Preparedness Department

(252) 331-6000, ext 3054

e-mail: [lforesman@nsfcc.uscg.mil](mailto:lforesman@nsfcc.uscg.mil)